



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 15 2011

B. George Saliba, CHMM
Environmental Supervisor
Alcoa Technology Center
100 Technical Drive
Alcoa Center, PA 15069-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dear Mr. Saliba:

This is in response to your letter of August 5, 2011, notifying the Environmental Protection Agency (EPA) of your intent to ship a sample of Polychlorinated Biphenyl (PCB)-contaminated river sediment to an off-site laboratory for a study of particular remediation technology under investigation there. Your letter is intended to serve as notice for an exemption pursuant to 40 CFR part 761.80(i) and it also requests the Agency's approval of larger samples than the standard size specified under §761.80(i).

Samples of PCB waste do not require an exemption under §761.80(i) to be shipped within the United States for such studies. Processing and distribution in commerce of PCBs associated with research and development for disposal are regulated under existing provisions at §761.20(c); persons engaging in this activity do not need to request an exemption under §761.80(i), which is intended to allow shipments of PCBs for use as standards. In addition to applicable Department of Transportation requirements and the marking provisions of 40 CFR §761.40 for PCB waste, ALCOA and the receiving laboratory will need to comply with either the provisions at §761.60(j) for research and development for PCB disposal, or a specific disposal approval from EPA if one has been issued.

For additional information on §761.80(i) exemptions, please contact Peter Gimlin of my staff at gimlin.peter@epa.gov or 202-566-0515. For information about shipments and management of PCB waste samples and the provisions of §761.60(j), please contact Amy Hensley of EPA's Office of Resource Conservation and Recovery at hensley.amy@epa.gov or 703-305-5084.

Sincerely,

Tala R. Henry, Ph.D.
Acting Director, National Program Chemicals Division
Office of Pollution Prevention and Toxics